

NPR-A Integrated Activity Plan Talking Points

In 2013, after a lengthy and deliberative process, the Bureau of Land Management (BLM) created an Integrated Activity Plan (IAP) for the National Petroleum Reserve-Alaska (NPR-A) that safeguarded the most ecologically sensitive areas of the NPR-A while also allowing for energy development in less-sensitive areas.

But now, the BLM is rewriting this plan, seeking to overturn protections for these irreplaceable places and making them available for sale to the oil industry even though millions of acres in the National Petroleum Reserve-Alaska are already available for oil and gas drilling.

- The NPR-A in Alaska's Western Arctic is a nearly 23 million acre public land --the size of Indiana. The NPR-A is home to the Western Arctic and Teshekpuk Lake Caribou Herds, which are **key subsistence resources** to numerous northern Alaskan communities.
- **These actions are being rushed on an accelerated timeline.** With concurrent development proposals across the Arctic, including an EIS for leasing in the Beaufort Sea, seismic testing proposed in the coastal plain of the Arctic Refuge, and the draft EIS on coastal plain leasing released at the end of December, there is not enough time or sufficient hearings for the public to adequately digest this and comment substantively. This has been compounded by the government shutdown which left the public unable to contact officials and ask basic questions about times and dates for scheduled hearings [which continued despite the shutdown](#). The public must be involved in decisions that will have major impacts on our climate, [health](#), and economies.
- New development will impact the **Teshekpuk Caribou Herd** in the Teshekpuk Lake Special Area. There are already significant impacts from development and leases under the current IAP. How will these proposed actions compound existing impacts? New permitted and planned oil projects in areas of the NPR-A that are open for development will bring that development into the Teshekpuk Caribou Herd habitat for the first time. Over half of this herd remains in the Arctic over winter, unlike any other Arctic herd. We don't know yet what the impacts will be to this herd.
- Many of the areas under consideration for leasing are **critical for subsistence use**. It is important to look at the intensity of use in the Special Areas, and provide adequate opportunities for communities in the region to fully participate as cooperating agencies, and through government to government consultation and public meetings.
- ConocoPhillips Alaska, Inc. has already initiated development efforts for the Willow Prospect in and around the **Teshekpuk Lake Special Area**. The wetlands North and West of Teshekpuk Lake are targeted by the oil and gas industry for its oil reserves, despite the critical nature of this area's ecological value.
 - Teshekpuk Lake in the Western Arctic is one of the most ecologically rich areas in the entire circumpolar Arctic region.

- Areas around Teshekpuk Lake where oil and gas leasing is prohibited should remain as no leasing areas. There is no reason to open more acreage for development and many reasons to keep the Teshekpuk Lake wetlands protected.
- The tundra, ponds, and wetlands surrounding the lake form the habitat that is so critical for birds and wildlife.
- The Teshekpuk Lake wetlands complex is a safe haven for wildlife. This region provides habitat for a multitude of birds and wildlife, including up to 100,000 molting geese of several species, over half a million shorebirds, high densities of loons and eiders, denning polar bears, and tens of thousands of caribou in the Teshekpuk Caribou Herd.
- The other special areas within NPR-A, which could potentially be impacted, are:
 - **The Colville River Special Area** is home to 22 fish species. Bluffs along the river are high-density nesting habitat for birds of prey, including Peregrine Falcon, Gyrfalcon, Rough-legged Hawk, and Golden Eagle. The Colville River delta is a haul-out area for spotted seals, and habitat for a multitude of breeding and migrating birds.
 - **The Utukok Uplands Special Area** protects the core calving ground for the Western Arctic Caribou Herd, Alaska's largest herd. The upper Utukok River is also habitat for moose, high densities of raptors, wolverines, grizzlies, wolves, and pink and chum salmon.
 - **The Peard Bay Special Area** is comprised of small thaw lakes adjacent to the bay. This area is a concentration area for three species of ice seals, polar bears, waterfowl, and shorebirds.
 - **The Kasegaluk Lagoon Special Area** is important for birds and marine mammals. Here, beluga whales give birth to their calves and hundreds of walrus and spotted seals haul out on the barrier islands.
- Habitat within the Reserve is already undergoing **dramatic changes due to our warming climate**. Coastal erosion is changing caribou and goose distribution, and thermokarst is transforming landscapes throughout the region. Increased fossil fuel development means further climate impacts. The IAP must address these changes.
- BLM must consider and fully analyze **cumulative effects of past, present, and reasonably foreseeable future activities**, including development not analyzed in the 2013 IAP (e.g., Willow, GMT2), nearshore and offshore Beaufort Sea development (e.g., Liberty), increased development in adjacent state lands, proposed development in the Arctic National Wildlife Refuge, and the State of Alaska's Arctic Strategic Transportation and Resources project. [See a map of current oil & gas activity here.](#)
- BLM must consider and fully analyze a suite of alternatives, **including a No Action alternative** that fully retains the boundaries and protective measures of the five Special Areas.
- Further, in light of ongoing effects of climate change already being felt throughout the Arctic and the NPR-A, **more protective alternatives that expand areas of "no new**

non-subsistence infrastructure” within special areas need to be considered. There is new science and a new understanding of the effects of climate change since the 2013 IAP was completed that must be considered.

- There is no such thing as “environmentally responsible” oil and gas development. As history has shown, time and time again, oil drilling involves a trade-off between environmental values and industrialization. Fossil fuel development is not compatible with the protection of sensitive areas like the Teshekpuk Lake wetlands.